UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAR 29 2012

Les Evans
Senior Vice President & COO
Kansas Electric Power Cooperative, Inc.
P.O. Box 4877
Topeka, Kansas 66604-0877

RE: Kansas Electric Power Cooperative, Inc. – RICE NESHAP Open Crankcase Filtration System Determination Concurrence Request

Dear Mr. Evans:

On February 9, 2012, the United States Environmental Protection Agency (EPA) Region 7 received a request from Kansas Electric Power Cooperative, Inc. (KEPCo) to make a determination on whether the open crankcase filtration systems currently existing on several KEPCo engines meet the definition of "open crankcase ventilation system" (OCVS) as described at 40 C.F.R. § 63.6625(g). Provided the Caterpillar "breather" reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals (40 C.F.R. § 63.6625(g)(2)), which it appears it does, the "breather" would qualify as an OCVS.

Background

Although EPA did not specifically define OCVS in 40 CFR Part 63, Subpart ZZZZ (MACT ZZZZ), EPA did describe several aspects of an OCVS in the February 17, 2010 MACT ZZZZ Response to Comments. EPA stated that open crankcase filtration emission control systems reduce emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals. EPA stated that it expected the filter will remove nearly 98 percent of the metallic HAP and other particulates from the crankcase exhaust stream, based on comparable filtration systems for other processes (e.g., baghouses and cartridge filtration systems). EPA did not, however, prescribe a numerical limit in MACT ZZZZ due to the difficulty in capturing the emissions using EPA Method 29 and due to the cost associated with testing. EPA further explained that oil collected by the filtration system for open crankcases is either collected and disposed of properly or routed back to the oil pan. The filter with the collected metallic HAP and other particulate in the open crankcase filtration system is replaced periodically and the used filter is disposed of properly.

Although KEPCo did not provide specific information on the efficiency of the "breather" to filter the exhaust stream to remove oil mist, particulates, and metals, it appears that the "breather" does filter the exhaust stream based on information submitted by you and Caterpillar. As previously stated, the RICE MACT does not require a minimum control efficiency for this filtration system and does not explicitly require the filtration system to be tested. The owner or operator would, however, have to follow the manufacturer's specified maintenance requirements for operating and maintaining the control system and for replacing the crankcase filters, as required by 40 C.F.R. § 63.6625(g).

If you have any questions regarding this letter, please contact David Peter at (913) 551-7397.

Sincerely,

Mark A. Smith, Chief
Air Permitting and Compliance Branch
Air and Waste Management Division